

72

file 72

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

APR 28 1987

Mr. V. R. Patil
Director, Industrial Engineering
Wickes Manufacturing Company
P.O. Box 999
Southfield, Michigan 48037



R00307853
RCRA RECORDS CENTER

RE: Eagle Signal Controls
Davenport, Iowa
EPA I.D. No. IAD051001337

Dear Mr. Patil:

The response from Eder Associates Consulting Engineers, P.C., to our January 6, 1987 letter has been received. In our letter, we had requested information regarding a closure performance standard, a professional engineer's certification of closure, information regarding stains of the asphalt in the old container storage area and whether or not Wickes wished to voluntarily conduct a RCRA Facility Assessment. The response has been reviewed and is complete as submitted.

Your approved closure plan for Eagle Signal is enclosed. It is composed of:

1. the July 27, 1984 plan submitted to the Iowa Department of Water, Air and Waste Management (IDWAWM);
2. IDWAWM amendments of the July 27, 1984 plan; and
3. the closure performance standard as stated in item 1 of Eder Associates' March 20, 1987 letter.

Lastly, my staff has determined that Eagle Signal has adequately closed its hazardous waste container storage area. That determination is based on certifications from both an independent professional engineer and the owner/operator that closure was performed in accordance with the closure plan approved by IDWAM. Eagle Signal is now released from the financial

WSTM:RCRA:IOWA:HERSTOWSKI:sb:4-7:mb:4/23/87

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IOWA
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SANDERSON

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WAGONER

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LA Flournoy
4/24/87

MS
4/27/87

Jim

requirements of 40 Code of Federal Regulations Parts 265.143 and 265.147. As previous discussions and correspondence have indicated, Eagle Signal will continue to maintain interim status until an RFA has been completed. Eder Associates' letter states that Eagle Signal will allow EPA to conduct the RFA.

Thank you for your cooperation. If you have any further questions, please contact Ken Herstowski of my staff.

Sincerely yours,

David A. Wagoner
Director, Waste Management Division

Enclosure

cc: Pete Hamlin, IDNR
Nicholas Andrianas
Eder Associates



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

CERTIFIED MAIL
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APR 28 1987

Mr. V. R. Patil
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Wickes Manufacturing Company
P.O. Box 999
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David A. Wagoner
Director, Waste Management Division

Enclosure

cc: Pete Hamlin, IDNR
Nicholas Andrianas
Eder Associates



eder associates
consulting engineers, p.c.

July 27, 1984
File #492-7

Ms. Barbara Cook, P.E.
Air and Waste Permits Branch
Iowa Department of Water, Air
and Waste Management
Henry A. Wallace Building
900 East Grand
Des Moines, Iowa 50319

Re: Gulf & Western Manufacturing Company
Eagle Signal Controls
EPA ID#-IADO51001337

Dear Ms. Cook:

Eder Associates has been retained by Gulf & Western Manufacturing Company to assist Eagle Signal Controls in complying with State of Iowa environmental regulations. The following information is submitted in response to your letter dated June 5, 1984 to Mr. Michael Bauer, concerning the closure plan, financial requirements and drum storage at Eagle Signal. The item numbers correspond to those in your letter.

1. Decontamination steps to clean any residues, if present, in the drum storage and run-off areas will consist of shoveling the residue into drums, using absorbent material to form a berm around the area which contained the residue, washing the residue contaminated pavement with a suitable detergent solution, collecting the washwater with absorbent material, and shoveling the absorbent material into drums. An alternate method will be constructing a berm of spill absorbent material around the storage and run-off areas to contain the washwater, detergent washing the area and pumping the washwater into drums.
2. Cleanup residues, if generated, will be tested for the characteristics of hazardous wastes as defined in 40 CFR, Part 261, Subpart C.
3. Adequate cleanup of the residues will be determined on the basis of a visual inspection. If the inspection reveals the presence of residues, an additional detergent washing will be performed. The inspection will include checking for solid or semi-solid residue material.

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IOWA DEPARTMENT OF
WATER, AIR, AND WASTE
JUL 31 1984

84 AUG 3 AM 11 12

Continued . . .

85 FOREST AVENUE • LOCUST VALLEY, NEW YORK 11560 • (516) 671-8440

LEONARD J. EDER, P.E. • FREDERICK H. INYARD, P.E. • STEPHEN J. OSMUNDSEN, P.E. • GARY A. ROZMUS, P.E.
JOHN MCGUIRE, P.E. • JORGE MOLINA, ING. • WILLIAM J. CUNNINGHAM, P.E. • VINCENT J. FRISINA, P.E.

Ms. Barbara Cook, P.E.
Iowa Department of Water Air
and Waste Management
July 27, 1984

-2-

4. Closure of the facility will involve removal and disposal of all drums from the drum storage area. Corrosive wastes will be neutralized, repackaged and solidified for off-site disposal in a hazardous waste landfill. Ignitable wastes will be removed, as is, in drums and shipped to an off-site hazardous waste incineration facility. Waste safety solvent will be shipped off-site to a reclamation facility.

Neutralization of the corrosive wastes will be conducted on-site in the drum storage area. The operation will be performed on a 14 mil thick polyethylene liner to minimize the potential of accidental contamination of facility equipment and structures. A minimum three (3) inch high berm of spill absorbent material will be formed around the perimeter of the liner for spill containment. The berm will be set on top of the liner. Upon completion of the operation, the berm will be swept toward the center of the liner and the liner will be folded, drummed and disposed of as hazardous waste. The empty drums will be triple rinsed with water and shipped off-site to be crushed. The rinsate will be drummed and disposed of off-site as hazardous waste. The drum pumps, protective clothing, brooms, and respirators will be drummed and disposed of as hazardous wastes.

Materials, Equipment and Labor:

- a. Calcium hydroxide
- b. Dry All (diatomaceous earth)
- c. Water source and hose
- d. Forklift with barrel attachment
- e. Handtruck
- f. Pick-up truck
- g. Box end tractor trailer
- h. Drum pumps
- i. Brooms
- j. Respirators
- k. Protective clothing (disposable)
- l. Polyethylene liner
- m. New and reconditioned 55 gallon drums (DOT approved)
- n. Face shields and helmets
- o. Eyewash stations
- p. 112 total man-hours

Continued . . .

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WATER AIR AND WASTE
JUL 31 1984

Ms. Barbara Cook, P.E.
Iowa Department of Water Air
and Waste Management
July 27, 1984

-3-

All of the materials, equipment and labor, except item c
will be provided by:

ESG Watts
Environmental Services Group, Inc.,
438 4th Street
Rock Island, Illinois 61201

5. The expected date of final closure is August 3, 1984.
6. (a) Closure began on April 24, 1984.
(b) Completion of closure is expected by August 3, 1984. Total time for closure is approximately three (3) months. The time lag was caused by delays in obtaining the permits required for final disposal.
(c) The time required to remove wastes will be approximately two days.
(d) Decontamination steps for the drum storage area, if required, will take approximately two (2) hours.
(e) The wastes were sampled over a two (2) day period on December 7, 1983 and January 16, 1984. Sampling of residues, if necessary, will be performed at the time of final closure.
(f) Closure certification will be submitted by September 4, 1984.
7. As per your telephone conversation with Nicholas Andrianas of our office on July 9, 1984, closure certification by a P.E. will not be required if: 1) a letter certifying that the facility was properly closed is issued by Gulf & Western Manufacturing Company from the vice presidential level; and (2) a regional inspection by the Iowa Department of Water, Air and Waste Management is conducted to verify satisfactory closure. The letter of closure certification will be submitted by Gulf & Western to your office by September 4, 1984.

Continued . . .

RECEIVED
IOWA DEPARTMENT OF
WATER, AIR AND WASTE
MANAGEMENT

7/31/84 3 AM 11 12

Ms. Barbara Cook, P.E.
Iowa Department of Water Air
and Waste Management
July 27, 1984

-4-

8. Financial documents will be submitted directly to your office by Gulf & Western Executive Offices.
9. The outdoor drum storage area will no longer be in use upon completion of closure. As a small quantity generator, the facility will store less than 1,000 kg per month. The waste will be stored in drums. Ignitable wastes will be stored in an existing flammable liquids storage room in compliance with NFPA-30, Flammable and Combustible Liquids Code. All other hazardous waste material will be stored in drums in the chemical storage room adjacent to the plating shop.

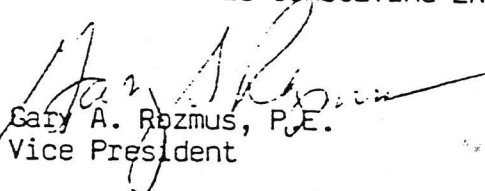
As of this date, closure of the facility is nearly complete. There are 10 drums of neutralized, corrosive wastes remaining in storage. These wastes will be repackaged on July 30 or July 31, 1984, removed from the facility and transported to a hazardous waste landfill.

Gulf & Western Executive Offices will issue to your office a letter from the vice presidential level requesting the change in status from hazardous waste TSD facility to small quantity generator. We anticipate that upon your approval of the closure plan including the information in this letter, the financial instruments and the letter requesting a change in status, your office will proceed with the process of changing facility status. It is also our understanding that your office will coordinate this process with the USEPA and therefore we need not contact EPA directly.

Please do not hesitate to contact our office if you have any questions.

Very truly yours,

EDER ASSOCIATES CONSULTING ENGINEERS, P.C.


Gary A. Rozmus, P.E.
Vice President

GAR/tg

cc: M. Bauer
R. Patil
J. Lindsay
M.W. Van Lier

RECEIVED
WATER AIR AND WASTE
DIVISION
JUL 31 1984

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JUL 3 11 12



department of water, air and waste management

KC EPA
Chet McLaughlin
Pomeroy
yile

February 28, 1985

Mr. Chelton McLaughlin
Waste Management Branch
Air and Waste Management Division
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, KS 66101

EPA-AKWMM/SPRS

MAR 06 1985

Region VII, Kansas City, Missouri 64106

RE: Eagle Signal Controls, IAD051001337
Termination of Interim Status

Dear Mr. McLaughlin:

On August 27, 1984, Mr. R. Klemens, Vice-President of Gulf & Western Manufacturing Company submitted a request to remove Eagle Signal Corporation from the hazardous waste system. The Department has reviewed Mr. Klemens' request and recommends that it be granted. This decision is based on:

1. A January 31, 1984 letter from Donald Dresman of Gulf & Western Industries, Inc. to EPA demonstrating financial assurance for closure.
2. An April 11, 1984 letter from Michael Bauer of Gulf & Western Manufacturing Company submitting revisions to the financial test documents.
3. A May 23, 1984 letter from Richard W. Erickson of Eagle Signal Controls regarding status of closure activities.
4. A July 27, 1984⁴ letter from Gary Rozmus of Eder Associates Consulting Engineers to Barbara Cook submitting the closure plans. A copy of the amended closure plan is enclosed.
5. A August 6, 1984 letter from Michael Bauer of Gulf & Western Manufacturing Company to Barbara Cook demonstrating liability coverage for sudden accidental occurrences.
6. A August 27, 1984 letter from R.W. Klemens to R.E. Campbell requesting termination and indicating that closure was conducted as per Eder Associates closure plan. A copy of that letter is enclosed.
7. A August 30, 1984 Regional inspection report. A copy of that report is enclosed.

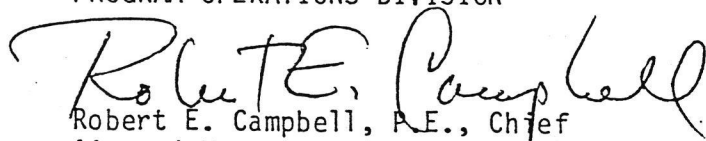
LR:rls/AWPW058K12.01

Chelton McLaughlin
Kansas City, Kansas
February 28, 1985
Page 2

The Department requests that EPA begin the notice of intent to terminate interim status. This agency waives its right to public notice the closure plan for the above identified facility. If you have any questions on our decision, please contact Linda Reding at 515/281-8959.

Sincerely,

PROGRAM OPERATIONS DIVISION


Robert E. Campbell, P.E., Chief
Air and Waste Permits Branch

REC:LR:rls/AWPW058K12.01

cc: Region 6

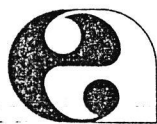
Amendments to Gulf & Western
Manufacturing Company
Eagle Signal Controls
EPA ID #IAD051001337
July 27, 1984 Closure Plan
by IDWAWM

I. Page 3 - Item 6(f):

Closure certification will be submitted by an executive the level of Vice President or higher from Gulf & Western Manufacturing Company and from an independent registered engineer within 180 days after the closure plan has been approved, in accordance with 40 CFR 265.115.

II. Page 3 - Item 7 - delete

March 20, 1987
File #492-7



Ken
eder associates
consulting engineers, p.c.

REGISTERED MAIL

Ms. Luetta Flournoy
United States Environmental
Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Re: Eagle Signal Controls Division
Wickes Manufacturing Company
Davenport, Iowa
EPA I.D. No. IAD051001337

Dear Ms. Flournoy:

Eder Associates Consulting Engineers submits this letter on behalf of Eagle Signal in response to the United States Environmental Protection Agency's (USEPA) January 6, 1987 letter to Mr. Patil of Wickes Manufacturing Company.

The USEPA's January 6, 1987 letter requested that Eagle Signal submit the following:

1. A closure performance standard for the drum storage area;
2. A Professional Engineer's Closure Certification;
3. Source(s) of stained asphalt - concrete in the drum storage area; and
4. The RCRA - Facility Assessment (RFA) option which would be implemented by Wickes.

The following actions have been undertaken in response to the Agency's requests:

1. The closure performance standard was specified in Eder Associates' July 27, 1984 letter to the Iowa Department of Water, Air and Waste Management (IDWAWM), which specified the closure plan for the drum storage area at Eagle Signal. Cleanup was performed in August 1984 to background levels on the basis of a visual inspection. This performance standard was accepted by both the USEPA and the IDWAWM at the time of closure in August 1984.
- 2 & 3. A closure certification prepared by Eder Associates is included with this letter. Please note that the state did not require an engineer's certification at the time of closure in 1984. The owner's certification followed by a state inspection was accepted by the state in 1984 in lieu of the engineer's

Continued . . .

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Ms. Luetta Flournoy
United States Environmental
Protection Agency
March 20, 1987

-2-

certification. The owner's certification was provided to the state in September 1984. The state inspection was conducted in August 1984.

The state reported in August 1984 that the drum storage area was cleaned in accordance with the closure plan. Stains of the asphalt-cement in the area were observed by the state in August 1984, but as noted in their inspection report, these stains did not appear to be the result of spilled waste. In September 1984, the state accepted that closure had been completed and recommended to the USEPA that Interim Status of the facility be terminated.

On March 13, 1987, Eder Associates visually inspected the former drum storage area. There were no wastes or waste residues evident in the area. Some stains of the asphalt-cement were observed, however, this area was used as a parking lot, and the stains identified by Eder Associates and the state during inspections in February 1984 and August 1984 are apparently: 1) those typically found in a parking lot (oil drip stains); and 2) rust.

4. Wickes Manufacturing has decided to allow the USEPA to conduct the RFA at Eagle Signal.

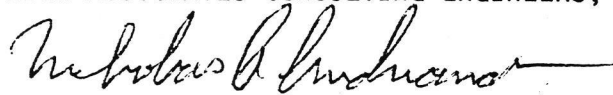
This letter satisfies the closure requirements and USEPA should release Wickes from the financial requirements of 40 CFR Parts 265.143 (h) and 265.147 (a) in accordance with the USEPA's January 6, 1987 letter.

Please indicate in writing that Wickes Manufacturing has satisfied USEPA RCRA closure requirements for the drum storage area.

Thank you for your consideration and cooperation.

Very truly yours,

EDER ASSOCIATES CONSULTING ENGINEERS, P.C.



Nicholas A. Andrianas
Project Engineer

NAA/tg
Attmt.

cc: J. Degryse

P 300 110 646

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

★ U.S.G.P.O. 1985-480-794

Sent to *V. R. Patel*
Dir, Industrial Eng.

Street and No.
Wickes mfg Co

P.O., State and ZIP Code

PO Box 999 Southfield MI
48037

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Special Delivery Fee

Restricted Delivery Fee

Return Receipt showing
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Return Receipt showing to whom,
Date, and Address of Delivery

TOTAL Postage and Fees

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Postmark or Date

APR 28 1987

PS Form 3800, June 1985

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CERTIFIED MAIL FEE, AND CHARGES FOR ANY SELECTED OPTIONAL SERVICES. (see front)**

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2. If you do not want this receipt postmarked, stick the gummed stub to the right of the return address of the article, date, detach and retain the receipt, and mail the article.
3. If you want a return receipt, write the certified mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number.
4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse **RESTRICTED DELIVERY** on the front of the article.
5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in item 1 of Form 3811.
6. Save this receipt and present it if you make inquiry.

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery.

3. Article Addressed to:

V.R. Patil
Director, Industrial Engg.
Wickes Manufacturing Co
P.O. Box 999
Southfield, MI 48037

4. Article Number

P 300 110 646

Type of Service:

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|---|----------------------------------|
| <input type="checkbox"/> Registered | <input type="checkbox"/> Insured |
| <input checked="" type="checkbox"/> Certified | <input type="checkbox"/> COD |
| <input type="checkbox"/> Express Mail | |

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee

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- Endorse article "Return Receipt Requested" adjacent to number.



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U.S. EPA, RCRA Branch
726 Minnesota Avenue
Kansas City, Kansas 66101

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